

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**JANE DOE, BY AND THROUGH HER  
PARENTS, JANE ROE AND JOHN ROE,**

**Plaintiff,**

**vs.**

**AMERICAN AIRLINES GROUP INC.,  
AND DOES 1-10,**

**Defendants.**

**CASE NO. 3:23-cv-819**

**DEFENDANT AMERICAN AIRLINES  
GROUP INC.'S RESPONSE TO  
PLAINTIFF'S MOTION FOR LEAVE  
TO CONDUCT EARLY DISCOVERY**

NOW COMES Defendant American Airlines Group, Inc. (hereafter "This Defendant"), by and through their undersigned their attorney Kathryn A. Grace, Esq. of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, and in response to Plaintiff's *Motion for Leave to Conduct Early Discovery*.

1. On January 16, 2024, Plaintiff filed a *Motion for Leave to Conduct Early Discovery*, seeking the identities of American Airlines employees and the personnel file of Doe Defendant 1. (Document No. 14).
2. In a good faith effort to resolve the dispute raised in Plaintiff's Motion, the undersigned counsel for this Defendant offered to provide the identity of each of the crew members on the flight that is the subject of Plaintiff's Complaint and offered to accept service for those that remain employed with this Defendant.
3. It is this Defendant's position that by providing Plaintiff with the requested information needed to amend and serve their Complaint, the relief sought in Plaintiff's Motion is moot.
4. This Defendant contends that all other discovery in this case should proceed as the rules dictate.

5. This Defendant has no objection to Plaintiff's alternative request for a 90-day extension of time for service pursuant to Rule 4(m) of the Federal Rules of Civil Procedure.

For the reasons stated above, Defendant American Airlines Group, Inc. respectfully requests that the Court find that the relief sought in Plaintiff's *Motion for Leave to Conduct Early Discovery* has been provided, and therefore Plaintiff's Motion is Moot.

Respectfully submitted this 30th day of January 2024.

**WILSON, ELSER, MOSKOWITZ, EDELMAN  
& DICKER LLP**

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## **CERTIFICATE OF SERVICE**

This is to certify that the undersigned caused the foregoing **DEFENDANT AMERICAN AIRLINES GROUP, INC.'S RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO CONDUCT EARLY DISCOVERY** to be filed and served on all counsel of record using the CM/ECF filing system:

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This 30th day of January 2024.

## **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

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